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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
BEHZAD TALAI MOFRAD,)
)
Defendant.)

No. CR 13-00232 YGR

STIPULATION AND ~~PROPOSED~~
ORDER TO SET CHANGE OF PLEA
HEARING ON JUNE 6, 2013

The above-captioned matter was previously set on May 16, 2013 before the Court for a change of plea hearing. The parties request that this Court set this matter for a change of plea hearing on June 6, 2013 at 2:00 p.m., and that the Court exclude time under the Speedy Trial Act between April 11, 2013 and June 6, 2013. The parties stipulate that the time is excludable from the time limitations of the Speedy Trial Act because the interests of justice are served by granting a continuance, pursuant to 18 U.S.C. § 3161(h)(1)(G).

Such continuance is required to afford time for consideration by the Court of the proposed plea agreement to be entered into by the defendant and the government. On

1 April 11, 2013, a copy of the proposed plea agreement was submitted to the Court for
2 review. As such, the parties respectfully request that the time between April 11, 2013 and
3 June 6, 2013 be excluded under 18 U.S.C. § 3161(h)(1)(G).
4

5 DATED: April 18, 2013

Respectfully submitted,

6 MELINDA HAAG
7 United States Attorney

8 /s/
9 RODNEY C. VILLAZOR
Assistant United States Attorney

10 /s/
11 ELLEN VALENTIK LEONIDA
Attorney for Benzai Talai Mofrad

12 **ORDER**

13 Based on the reason provided in the stipulation of the parties above, the Court
14 hereby FINDS that for time necessary for consideration by the Court of the proposed plea
15 agreement, and in the interest of justice, pursuant to 18 U.S.C. §§ 3161(h)(1)(G), an
16 exclusion of time is warranted under the Speedy Trial Act. Based on these findings, IT IS
17 HEREBY ORDERED THAT time is excluded until June 6, 2013.

18
19 **IT IS SO ORDERED.**
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21 DATED: April 18, 2013

22 
23 YVONNE GONZALEZ ROGERS
United States District Judge
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